

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

JANE DOE,

Plaintiff,

v.

ST. PAUL'S SCHOOL,

Defendant.

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Case No. 1:18-cv-00390-PB

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**STATUS REPORT AND ASSENTED-TO MOTION TO STAY CASE FOR AN
ADDITIONAL SIXTY DAYS**

Plaintiff Jane Doe respectfully files this assented-to motion to inform the Court of the status of the parties' ongoing discussions, and to further stay this action for sixty (60) days.

1. Counsel for the parties are engaged in active discussions about this case.
2. On September 11, 2018, this Court granted the parties' assented-to motion to stay the case for sixty (60) days to allow the parties to continue those discussions, and requested a status report from the parties by November 13, 2018.
3. The parties continue to pursue discussions about the case.
4. Plaintiff requests this stay, on consent, in the interest of continuing those discussions.
5. This Court has broad discretion "to stay proceedings[,] ... incidental to the power inherent in every court to control the disposition of the [cases] on its docket with economy of time and effort for itself, for counsel, and for litigants." *Landis v. North Am. Co.*, 299 U.S. 248, 254 (1936).

6. That standard is satisfied here because the limited stay of proceedings will avoid needless litigation and conserve judicial resources by potentially facilitating an early resolution to the action.
7. Counsel for the parties have conferred, and Defendant assents to this motion.

WHEREFORE, Jane Doe respectfully requests that this Honorable Court issue an Order:

- A. Staying this case and all pending deadlines for sixty (60) days;
- B. Extending the deadline for the parties to submit a joint status report to January 13, 2019;
and
- C. Granting such other relief as is just and proper.

Respectfully submitted,

Date: November 7, 2018

/s/ Charles G. Douglas, III
Charles G. Douglas, III (NH Bar. No.669)
DOUGLAS, LEONARD & GARVEY, P.C.
14 South Street, Suite 5
Concord, NH 03301
Phone: (603) 224-1988
Fax: (603) 229-1988
chuck@nhlawoffice.com

Steven J. Kelly (*pro hac vice*)
Deborah K. Marcuse (*pro hac vice*)
SANFORD HEISLER SHARP, LLP
400 East Pratt Street, 8th Floor
Baltimore, MD 21202
Phone: (410) 834-7420
Fax: (410) 834-7425
skelly@sanfordheisler.com
dmarcuse@sanfordheisler.com

Meredith Firetog (*pro hac vice*)
SANFORD HEISLER SHARP, LLP
1350 Avenue of the Americas, 31st Floor
New York, NY 10010
Phone: (646) 402-5650
Fax: (646) 402-5651
mfiretog@sanfordheisler.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was electronically served via ECF to all counsel of record on this 7th day of November 2018.

/s/ Charles G. Douglas, III

Charles G. Douglas, III